

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



June 24, 2008

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at a Premiere Screening of the Disney Movie "WALL-E" at the Newseum, on June 24, 2008

On the evening of June 24, 2008, the Walt Disney Company (Disney) will host a no-fee premiere screening of its new film, "WALL-E," at the Newseum in Washington, D.C. Free refreshments being provided by Disney are popcorn and soda. Of the 420 or so invitees, half are Congressional members and/or staffers; the other half of the invitees are made up of Disney, Newseum, media, students, and NASA employees. The movie features an animated protagonist which is a NASA Mars Rover, and so is considered helpful to understanding of NASA's continuing Mars missions. NASA has an active Space Act agreement with Disney relating to this movie, which has already included educational outreach presentations by Rover programmers and controllers to school-age children. The Space Act agreement does not require that Disney provide a free screening to some or all NASA employees. The screening, however, will provide an opportunity to promote knowledge and understanding of the space program with other attendees.

I find that the Disney screening event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the screening will allow NASA representatives to exchange views on technologies that may be needed for future space missions with a wide-range of people from industry, academia, Congress, and other Federal agencies.

NASA employees whose duties may substantially affect Disney, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.205(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone